

RESPONSE: Neither of the Defendants is a publicly owned company, and there are no publicly owned companies to identify in response to subparts (1)-(3).

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Defendants are not aware of any basis to challenge the appropriateness of the division. However, Defendants reserve and do not waive any arguments as to jurisdiction or venue.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of the Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Defendants agree with Plaintiff's statement that the above-captioned case is related to *In re SCANA Corporation Securities Litigation*, 3:17-cv-02616-MBS, ("*In re SCANA*") because both cases arise from the same operative facts. See Response to Interrogatory (E) [Dkt. No. 3].

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendants are properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Defendants state that the claims in *In re SCANA* largely overlap with the claims in the above-captioned case. *In re SCANA* has been brought on behalf of a putative class of SCANA securities purchasers that largely overlaps with the proposed class in the above-captioned case, and *In re SCANA* names different parties as defendants in that action. Those defendants include: SCANA Corporation, Kevin B. Marsh, Jimmy E. Addison, Stephen A. Byrne, Harold C. Stowe, D. Maybank Hagood, and James W. Roquemore. Defendants reserve the right to amend this response as information becomes available during the course of discovery.

Respectfully submitted,

/s/Christopher A. Ogiba

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